

Hearing Date: September 20, 2023, at 10:00 a.m. (ET)

Objection Deadline: July 14, 2023

Reply Deadline: August 18, 2023

**SEWARD & KISSEL LLP**

One Battery Park Plaza  
New York, NY 10004  
Tel: (212) 574-1200  
Fax: (212) 480-8421  
Mark J. Hyland  
Carmella R. O'Hanlon

*Attorneys for Defendant Reliance International  
Research LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

UBS EUROPE SE (f/k/a UBS (LUXEMBOURG)  
S.A.), UBS FUND SERVICES (LUXEMBOURG)  
S.A., UBS THIRD PARTY MANAGEMENT  
COMPANY S.A., M&B CAPITAL ADVISERS  
SOCIEDAD DE VALORES, S.A., RELIANCE  
INTERNATIONAL RESEARCH LLC,  
LUXEMBOURG INVESTMENT FUND AND  
LUXEMBOURG INVESTMENT FUND U.S.  
EQUITY PLUS, as represented by their

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Proc. No. 10-05311 (CGM)

**ORAL ARGUMENT  
REQUESTED**

Liquidators MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, in their capacities as liquidators and representatives of LUXEMBOURG INVESTMENT FUND AND LUXEMBOURG INVESTMENT FUND U.S. EQUITY PLUS,

Defendants.

**NOTICE OF HEARING ON RELIANCE INTERNATIONAL RESEARCH LLC'S MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, on May 5, 2023, Defendants Reliance International Research LLC ("RIR"), by and through its undersigned counsel, filed a motion (the "Motion") to Dismiss the Second Amended Complaint filed in the above-captioned adversary proceeding on February 24, 2023 at ECF No. 284 (the "Second Amended Complaint"), by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") and the chapter 7 Estate of Bernard L. Madoff (the "Trustee"), pursuant to Federal Rules of Civil Procedure 12(b)(6), made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure. The Motion will be heard before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York, on **September 20, 2023 at 10:00 a.m. (Eastern Time)** (the "Hearing"), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris' guidelines for remote appearances and are required to make arrangements in advance to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court's website at <https://www.nysb.uscourts.gov/zoom-videohearing-guide>.

PLEASE TAKE FURTHER NOTICE that, if you oppose the relief requested in the Motion you are required to file a written response (“Response”), and to serve the Response on RIR’s undersigned counsel so that it is received by **July 14, 2023** (the “Response Deadline”). RIR will file any reply papers in further support of the Motion on or before **August 18, 2023**.

PLEASE TAKE FURTHER NOTICE that, if no Response is timely served with respect to the Motion, RIR may, on or after the Response Deadline, submit to the Bankruptcy Court a proposed order granting the relief sought in the Motion.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, RIR does not consent to the entry of final orders or judgment by this Court.

Dated: New York, New York  
May 5, 2023

Respectfully submitted,  
SEWARD & KISSEL LLP

By: /s/ Mark J. Hyland  
Mark J. Hyland  
Carmella R. O’Hanlon  
One Battery Park Plaza  
New York, NY 10004  
Tel: (212) 574-1200  
Fax: (212) 480-8421  
[hyland@sewkis.com](mailto:hyland@sewkis.com)  
[ohanlon@sewkis.com](mailto:ohanlon@sewkis.com)

*Attorneys for Defendant Reliance International Research LLC*